

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE)	CHAPTER 13
)	
)	CASE NO.: 21-12905-PMM
)	
JAMIE DAWN WALKER,)	
Debtor)	
~~~~~	)	
ALLY BANK,	)	
	)	
vs.	)	<b>HEARING DATE:</b>
	)	Tuesday, October 04, 2022
	)	10:00 A.M.
JAMIE DAWN WALKER, and	)	
JOVONNA WALKER, Codebtor.	)	
	)	
and	)	
	)	
SCOTT F. WATERMAN	)	<b>LOCATION:</b>
	)	The Gateway Building, 201 Penn Street,
Trustee	)	4th Floor
	)	Courtroom No. 4
	)	Reading, PA 19601

**MOTION FOR RELIEF FROM AUTOMATIC STAY AND CODEBTOR STAY**

AND NOW, comes the above-captioned Movant, Ally Bank, by and through their attorney, Regina Cohen, who files this Motion based upon the following:

1. The Movant is a corporation having a principal place of business located at 1234 Main, Desoto, TX 75115.
2. The Respondent, Jamie Dawn Walker is an individual with a mailing address at 1705 Fairview Avenue, Easton, PA 18042, who has filed a Petition under Chapter 13 of the Bankruptcy Code.
3. On or about May 10, 2016, Debtor Jamie Dawn Walker and Co-debtor Jovonna Walker entered into a Retail Installment Sales Contract, involving a loan in the amount of \$23,553.78 for the purchase of a 2016 Kia Forte Hatchback 5D LX 2.0L I4.
4. The vehicle secured by the Contract has V.I.N. KNAFK5A88G5547985.
5. Movant is the assignee of the Contract.

6. The above – described vehicle is encumbered by a lien with a payoff in the amount of \$7,544.30 plus other appropriate charges as of August 29, 2022 but subject to change. The regular monthly payment is \$379.64 at an interest rate of 8.94%.

7. Applying payments received to the earliest payment due, payments have been missed post-petition, since April 24, 2022 in the amount of \$1,846.40, plus all applicable interest, attorneys' fees and costs.

8. The Property has a N.A.D.A. Value of \$14,225.00.

9. The vehicle is not necessary to an effective reorganization.

10. The Movant is the only lienholder of record with regard to the vehicle.

11. In order to proceed with repossession of the vehicle, relief from the automatic stay must be obtained.

12. Failure to make adequate protection payments is cause for relief from the automatic stay and codebtor stay.

13. The Movant has incurred attorney's fees in the filing of this Motion.

14. The vehicle is a rapidly depreciating asset. Movant requests the waiver of Rule 4001(a)(3).

WHEREFORE, Movant prays for your Honorable Court to enter an Order permitting the Movant to proceed with the repossession proceedings of the aforementioned vehicle.

Respectfully submitted,  
Lavin, Cedrone, Graver, Boyd & DiSipio

/s/ Regina Cohen  
Regina Cohen  
Attorney for Movant  
Suite 500 190 North Independence Mall West 6th &  
Race Streets  
Philadelphia, PA 19106  
(215) 351-7551